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**UNITED STATES DISTRICT COURT  
IN AND FOR THE DISTRICT OF WYOMING**

STEPHANIE WADSWORTH, Individually  
and as Parent and Legal Guardian of W.W.,  
K.W., G.W., and L.W., minor children, and  
MATTHEW WADSWORTH,

Plaintiffs,

v.

WALMART, INC. and JETSON  
ELECTRIC BIKES, LLC,

Defendants.

Case No.: 2:23-cv-00118-NDF

JURY TRIAL DEMANDED

**PLAINTIFFS' RESPONSE IN OPPOSITION TO DEFENDANTS' MOTION TO  
EXCLUDE THE TESTIMONY OF JEFFREY SHEAMAN**

**COME NOW**, the Plaintiffs, Stephanie Wadsworth, individually and as parent and legal guardian of W.W., K.W., G.W., and L.W., minor children, and Matthew Wadsworth, (hereinafter “Plaintiffs”) by and through their counsel of record Rudwin Ayala, Esquire and Morgan & Morgan, and submit their Response in Opposition to Defendants’ Motion To Exclude the

Testimony of JEFFREY SHEAMAN filed on December 2, 2024. In support of this Response, Plaintiffs would rely upon the filings of Plaintiff in Response to Defendants' Motion for Summary Judgment.

Detective Sheaman's opinions meet the reliability and admissibility standards set forth by Rule 702, he employed reliable methodology, and his opinions are necessary for a jury to understand the technical and scientific nature of design and manufacturing defect as related to this case. As such, Defendants' Daubert Motion must be denied.

Date: December 17, 2024

Respectfully Submitted,

/s/ Rudwin Ayala  
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**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on December 17, 2024, a true and correct copy of the foregoing was electronically served to all counsel of record.

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